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10 Attorneys for Defendant,
11 SEAGATE TECHNOLOGY LLC

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14
15 IN RE SEAGATE TECHNOLOGY LLC
16 LITIGATION

17 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DECLARATION OF GLEN ALMGREN
IN SUPPORT OF SEAGATE'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

18 Date: March 30, 2018

19 Time: 9:30 a.m.

20 Place: Courtroom G

Judge: Hon. Joseph C. Spero

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22 Second Consolidated Amended Complaint
filed: July 11, 2016

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24 REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

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3:16-cv-00523-JCS

SMRH:485048909.5 ALMGREN DECL. ISO SEAGATE'S OPPOSITION TO MOTION FOR CLASS CERTIFICATION

DECLARATION OF GLEN ALMGREN

I, Glen Almgren, declare as follows:

1. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

5 2. In 1998 I received a B.S. in mechanical engineering from the Colorado School of
6 Mines. I briefly worked as a manufacturing engineer for a company called Howard Industries. I
7 joined Seagate Technology LLC (“Seagate”) in 1999. I started as a product assurance engineer. My
8 role was to test and help conduct failure analysis on new hard disk drives that were in development.
9 In 2003, I became software lead for product assurance which meant I qualified the software that we
10 used for testing hard drives. In 2006 or 2007 I became a reliability program manager (“RPM”).
11 This means I was the reliability engineer or specialist on product core teams. A “core team” is the
12 group responsible for designing and developing a new hard disk drive, and I was the member
13 responsible for all the reliability testing of the drive being developed. I was RPM for Grenada
14 Classic. After I was RPM for Grenada Classic, I became the manager of the RPM group, which
15 means I managed and supervised the work of the other RPMs, including the RPMs for the Grenada
16 BP and Grenada BP2. In 2013 I became the engineering director for Seagate’s reliability group in
17 Longmont, Colorado. In this role, I oversee reliability testing and qualification of Seagate hard
18 drives for production. In other words, my team is responsible for ensuring that hard drives that are
19 being developed meet specifications and reliability goals, and are ready to enter mass production for
20 sale to consumers.

21 3. I have reviewed the declaration of Andrew Hospodor filed in support of Plaintiffs'
22 Motion for Class Certification. In it, Mr. Hospodor reviews internal Seagate documents and makes
23 statements or assertions that he claims are based on those documents. However, as explained below,
24 many of Hospodor's statements are clearly erroneous and/or misinterpret Seagate's documents.

25 | A. Background on Seagate Drive Testing

26 4. From 2011 to early 2016, Seagate used the internal codename “Grenada” to refer to a
27 family of drives that included the drives with model number ST3000DM001. The ST3000DM001

1 was the 3 terabyte (TB) version of the Grenada drive. There were three different versions of the
2 Grenada drives: the Grenada Classic, Grenada BP and Grenada BP2.

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10 C. Response to Paragraphs 83-89 of the Hospodor Declaration
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Figure 2 (Ex. 5 [FED_SEAG0057277] at p. 57324).

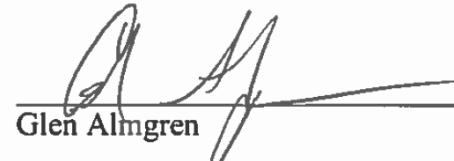
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7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed on this 4th day of January, 2018, at LONGMONT, Colorado.

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Glen Almgren

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